

Date: 7/9/99 5:20 PM
 Sender: Robert Lee Clark <clarkfarm@earthlink.net>
 To: 9-NPRM-CMTS
 Priority: Normal
 Subject: NPRM 99-03

FAA-99-5483 -41

Federal Aviation Administration

Comments concerning NPRM No. 99-03

Dear Sirs,

I have been a skydiver and a jump pilot for over 34 years and would like to comment on this NPRM.

> 1. The number of places in the present 105 that hold the pilot responsible for hazards, spotting mistakes, jump equipment, etc. is not practical in today's operations.
 > In most cases jump pilots may not have (nor are required to have) any expertise to make these decisions.
 The "Pilot shall not allow" phrases in the FAR's make the pilot responsible for the actions, equipment, ect. of the jumpers.

> 2. Two problems come to mind over this notification of the ATC facility
 > having jurisdiction over the airspace. First, our operation sets under two levels of airspace jurisdiction. We
 > have operated successfully for nearly 20 years with the Colorado Springs Approach
 > Control doing the coordinating (by land line) with Denver Center when we climb
 > to our higher, Center controlled, altitudes. Otherwise we would be
 > talking only to Center while dropping jumpers in higher Center airspace
 > who will quickly fall into lower Approach airspace. Although we are not
 > inside any class C airspace the local Approach gives us, and other
 > traffic, flight following in the airspace that has the most traffic.
 >
 > Secondly, unless I am reading this incorrectly, not advising the local
 > FSS of off-DZ jumps would eliminate parachuting NOTAM's which we count on
 > for safety and part of our "see and be seen" responsibility. Being a Published
 Parachuting Area we have no requirement to file NOTAMS in our normal operations area
 but do file NOTAM's for exhibition jumps outside that published area.
 >
 > 3. The requirement to report serious injuries to the FAA is a duplication of what
 our national organization does very well. As skydiving successfully oversees itself there
 is no need for further government involvement. All relevant information is available through
 the United States Parachute Association.

An injury/fatality reporting requirement is particularly unfeasible when applied to jump pilots.
 In most cases the pilots are continually involved with lift operations and, because injuries and fatalities are outside the area of operation, may not be aware of

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those incidents for some time if
at all. In high lift capability operations the flight operations
departments are completely separate from the
other parts of the operation. Also, in the case of off field
operations, the pilot does not return to the
jump site.

Sincerely,
Robert Lee Clark
Front Range Skydivers, Inc.
Calhan, Colorado (5V4)



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